



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

NOV 26 2019

Mr. Ravi Ramalingam, Chief
Consumer Products and Air Quality Assessment Branch
Air Quality Planning and Science Division
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Dear Mr. Ramalingam:

Thank you for your submission of the California Air Resources Board (CARB) *Annual Network Plan Covering Monitoring Operations in 25 California Air Districts, July 2019* ("Plan") on July 9, 2019. We have reviewed the submitted document based on the requirements set forth in 40 CFR Part 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this letter, EPA also approves the following system modifications: the discontinuation of the Lincon-1st Street site (AQS ID: 06-061-2002), establishment of the new Lincoln-Moore Road SLAMS site (AQS ID: 06-061-2003), and discontinuation of the PM_{2.5} FRM POC 1 monitor and designation of the primary PM_{2.5} FEM POC 3 SLAMS monitor at the Yreka site (AQS ID: 06-093-2001). We also approve the sampling waiver renewal request for 1:6 day sampling for five PM_{2.5} sites: Colusa (AQS ID: 06-011-1002), Lakeport (AQS ID: 06-033-3002), Roseville (AQS ID: 06-061-0006), Redding (AQS ID: 06-089-0004), and Woodland (AQS ID: 06-113-1003), and O₃ season waivers for six O₃ sites: Echo Summit (AQS ID: 06-017-0012), Cool (AQS ID: 06-017-0020), Jerseydale (AQS ID: 06-043-0006), White Cloud Mountain (AQS ID: 06-057-0007), Sutter Buttes (AQD ID: 06-101-0004), and Tuscan Butte (AQS ID: 06-103-0004) for November 2019-March 2020. Please note that an updated request including 2019 data will be required for future ozone season waiver approvals after March 31, 2020. More information about these approvals is included in Enclosures A and C.

In the State of California, ten district monitoring agencies submitted annual monitoring network plans this past year in accordance with 40 CFR 58.10. EPA received plans covering the 2018 calendar year from:

- Bay Area Air Quality Management District,
- Great Basin Unified Air Pollution Control District,
- Monterey Bay Unified Air Pollution Control District,
- North Coast Unified Air Pollution Control District,
- Sacramento Metropolitan Air Quality Management District,
- Santa Barbara County Air Pollution Control District,
- San Diego County Air Pollution Control District,
- San Joaquin Valley Air Pollution Control District,
- San Luis Obispo County Air Pollution Control District, and
- South Coast Air Quality Management District.

EPA has reviewed and approved all of the monitoring agency plans listed above with the exception of the Sacramento Metropolitan Air Quality Management District plan, which was submitted late.¹ EPA has provided specific comments on all other plans we received from California local agencies through separate letters and have forwarded these to CARB. Please refer to these responses for additional comments pertinent to CARB's network.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information provided does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Regarding the request for more information related to NO_y monitoring, Region 9 will forward the relevant information to EPA Headquarters so that they may consider the points raised by your agency. Enclosure A (*A. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements. Items highlighted in yellow are those EPA Region 9 is not acting on, as we either lack the authority to approve the specific item, or we have determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met. Items highlighted in green in Enclosure A require attention in order to improve next year's plan. Some annual network plans submitted by local agencies included sites operated by CARB. Missing or deficient information for CARB sites in local agency plans was addressed in the approval letters for each local agency. For convenience, we are providing a synthesized list of these issues in *Enclosure B. Elements Related to CARB Sites in Local Agency Plans Where EPA is Not Taking Action*.

All comments conveyed via this letter and enclosures should be addressed prior to submittal of next year's annual monitoring network plan to EPA.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Dena Vallano (415) 972-3134.

Sincerely,



Gwen Yoshimura, Manager
Air Quality Analysis Office

Enclosures:

A. Annual Monitoring Network Plan Checklist

¹ EPA received Sacramento Metropolitan Air Quality Management District's 2019 *Annual Monitoring Network Plan* on November 14, 2019. EPA's review is forthcoming and is not included in Enclosure B due to the late submittal. EPA will copy CARB on our response to the Sacramento Metropolitan Air Quality Management District's 2019 *Annual Monitoring Network Plan*. Please refer to this upcoming response for additional comments pertinent to CARB's network.

- B. Elements Related to CARB Sites in Local Agency Plans Where EPA is Not Taking Action
- C. EPA Approval of the Discontinuation of the Lincoln-1st Street Site and Establishment of the New Lincoln-Moore Road SLAMS Site

cc (via email): Jin Xu, CARB

Manisha Singh, CARB

Kathy Gill, CARB

Michael Miguel, CARB

Michael Werst, CARB

Sylvia Vanderspek, CARB

Webster Tasat, CARB

Ranjit Bhullar, CARB

A. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated July 10, 2018)

Year: 2019

Agency: California Air Resources Board (CARB)

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations.

40 CFR 58.10(a)(1) further directs that, “The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement.” On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year’s plan or outside the ANP process.
Green	item requires attention in order to improve next year’s plan.

	ANP requirement	Citation within 40 CFR 58 ²	Was the information submitted? ³ If yes, section or page #s.	Does the information provided ⁴ meet the requirement? ⁵	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1 st	58.10 (a)(1)	Y, cover letter	N	Plan submitted on July 9, 2019
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Y, cover letter, p.1, and App E	Y	
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable	58.10 (a)(1)	Y, p. 1	Y	
4.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	NA	NA	Please coordinate with EPA on anticipated system modifications that were in progress when the plan was written. Note that EPA approval is needed for the Mojave and Calexico-Ethel site relocations.
5.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Y, p. 48, Appendices C and D	Y	EPA is approving the discontinuation request for the Lincoln-1 st Street site and the new Lincoln Moore-Road SLAMS site with this plan. EPA is approving the discontinuation of the PM _{2.5} FRM POC 1 monitor and the newly designated regulatory SLAMS primary PM _{2.5} FEM POC 3 monitor (previously a non-FEM) at the Yreka site. See Row 26 for EPA's response on CARB's PM _{2.5} sampling frequency waiver renewal request.
6.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		Y, App D	N, in some instances	Please include documentation of the following in next year's plan. This is a repeat comment from last year:

² Unless otherwise noted.

³ Response options: NA (Not Applicable), Yes, No, or Incomplete.

⁴ Assuming the information is correct.

⁵ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

	ANP requirement	Citation within 40 CFR 58 ²	Was the information submitted? ³ If yes, section or page #s.	Does the information provided ⁴ meet the requirement? ⁵	Notes
					<ul style="list-style-type: none"> CARB's request and EPA's June 2017 approval of the discontinuation of CO and NO_x monitoring at the Armory site CARB's request and EPA's June 20, 2017 approval of discontinuation of CO monitoring at the El Centro site
7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Y, p. 48-49	Y	<p>CARB is considering the following system modifications:</p> <ul style="list-style-type: none"> Relocation of Calexico-Ethel monitoring site Relocation of Mojave monitoring site <p>Please work with EPA to ensure that any such system modifications are performed appropriately.</p>
8.	Precision/Accuracy reports submitted to AQS	58.16 (a)	Y p. 46	Y	The plan states that audit results are submitted to AQS quarterly.
9.	Annual data certification submitted	58.15	Y, p. 46	Y	Submitted on June 15, 2018
10.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. ⁶	58.11 (a)(2)	Yes, p. 11	Y	
11.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. ⁷	58.20 (c)	NA	NA	In 2018, no SPM monitors were operating in the area covered by this ANP.
12.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an	App D 2(e)	Y, p. 15	Y	

⁶ Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

⁷ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
	agreement between the affected agencies and the EPA Regional Administrator is in place				

GENERAL PARTICULATE MONITORING REQUIREMENTS (PM₁₀, PM_{2.5}, Pb-TSP, Pb-PM₁₀)

13.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	App. A 3.2.3	Y, App A	Incorrect, in one instance	The Grass Valley PM _{2.5} FEM POC 3 monitor should be designated as the primary monitor at this site.
14.	Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200 liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.]	App. A 3.2.3.4 (c) and 3.3.4.2 (c)	Y, p. 39, App A	Y	

PM_{2.5} -SPECIFIC MONITORING REQUIREMENTS

15.	Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor.	58.10 (c)	Y, p. 15	Insufficient to judge	As commented last year, in future plans, please also include language specifically addressing the requirement set forth in 40 CFR 58.10(c) (e.g., note that this applies to review of changes to a PM _{2.5} network, including violating PM _{2.5} monitors).
16.	Identification of any PM _{2.5} FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM _{2.5} with <u>NAAQS</u> -comparable monitor at the required sample frequency.]	58.10 (b)(13) 58.11 (e)	NA	NA	
17.	Minimum # of monitoring sites for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.7.1(a) and Table D-5	Y, p 32-3, Table 20	Y	Recent Santa Rosa MSA population estimates have been over 500,000, which would affect the number of required sites for the MSA. The Redding PM _{2.5} FRM monitor will be replaced with an FEM monitor in Spring

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
					2019 that will operate as an SPM for the next two years and may impact minimum monitoring requirements.
18.	Requirements for continuous PM _{2.5} monitoring (number of monitors and collocation)	App. D 4.7.2	Y, p. 34, App A	N, in one instance	The Redding MSA is not currently operating a required continuous PM _{2.5} FEM analyzer. The Redding PM _{2.5} FRM monitor is anticipated to be replaced with an FEM monitor in Spring 2019. Please also keep this requirement in mind as CARB works on the anticipated Calexico site relocation.
19.	FRM/FEM/ARM PM _{2.5} QA collocation	App. A 3.2.3	Y, p. 41-42	N, in one instance	For Method Type 170, only two sites are collocated with an FRM monitor; the CARB PQAO requires three collocated Method 170 FEM-to-FRM sites. The plan notes that CARB is working with the local air districts to replace the FEM/FRM collocation site previously located at Madera.
20.	PM _{2.5} Chemical Speciation requirements for official STN sites	App. D 4.7.4	Y, p. 38	Y	
21.	Identification of sites suitable and sites not suitable for comparison to the annual PM _{2.5} NAAQS as described in Part 58.30	58.10 (b)(7)	Y, p 36, App A	Y	
22.	Required PM _{2.5} sites represent area-wide air quality	App. D 4.7.1(b)	Y, p. 32	Y	
23.	For PM _{2.5} , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App. D 4.7.1(b)(1)	Y, p. 33, Table 20	Y	The Redding PM _{2.5} FRM monitor will be replaced with an FEM monitor in Spring 2019 that will operate as a SPM for the next two years.
24.	If additional SLAMS PM _{2.5} is required, there is a site in an area of poor air quality	App. D 4.7.1(b)(3)	NA	NA	
25.	States must have at least one PM _{2.5} regional background and one PM _{2.5} regional transport site.	App. D 4.7.3	Y, p. 37, App A	Y	

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
26.	Sampling schedule for PM _{2.5} - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4); 58.12(d); App. D 4.7	Y, p. 35-36 App C	N, in some instances	<p>Ridgecrest did not meet the required every day sampling frequency for part of 2018. However, Eastern Kern replaced their FRM with an FEM BAM on March 16, 2018, which now meets the sampling frequency requirement.</p> <p>Yreka did not meet the required every day sampling frequency for part of 2018. However, Siskiyou County APCD replaced their FRM monitor at Yreka with an FEM on July 1, 2018.</p> <p>On July 9, 2019 CARB submitted a sampling waiver renewal request for five PM_{2.5} sites: (Colusa (06-011-1002), Roseville (06-061-0006), Redding (06-089-0004), Lakeport (06-033-3002), and Woodland (06-113-1003). EPA approves this waiver request for all sites.</p>
27.	Frequency of flow rate verification for automated and manual PM _{2.5} monitors	App. A 3.2.1	Y, p. 45, App A	Y	
28.	Dates of two semi-annual flow rate audits conducted in CY2018 for PM _{2.5} monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.2.2	Y, App A	Y	

PM₁₀ –SPECIFIC MONITORING REQUIREMENTS

29.	Minimum # of monitoring sites for PM ₁₀ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D, 4.6 (a) and Table D-4	Y, p. 28-29, Table 17	Y	Some recent Santa Rosa MSA population estimates have been over 500,000, which would affect the number of required sites for the MSA. Table 17 notes that certain sites were impacted by wildfire smoke in 2018 that may affect minimum monitoring requirements in these MSAs. Please work with EPA to ensure that minimum monitoring requirements continue to be met in the future.
30.	Manual PM ₁₀ method collocation (note: continuous PM ₁₀ does not have this requirement)	App. A 3.3.4	Y, p. 42, App A	Y	
31.	Sampling schedule for PM ₁₀	58.10 (b)(4); 58.12(e); App. D 4.6	Y, p. 31, App A	N	The following monitors did not meet the required every day sampling frequency for 2018: <ul style="list-style-type: none"> • Anderson Springs • Lakeport • Redding • Shasta Lake • Woodland Table 18 notes that certain sites were impacted by wildfire smoke in 2018 that may affect sampling frequency requirements. Please work with EPA to ensure that sampling frequency requirements continue to be met in the future.
32.	Frequency of flow rate verification for automated and manual PM ₁₀ monitors	App. A 3.3.1 and 3.3.2	Y, p. 45, App A	Y	
33.	Dates of two semi-annual flow rate audits conducted in CY2018 for PM ₁₀ monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.3.3	Y, App A	Y	

Pb –SPECIFIC MONITORING REQUIREMENTS

34.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards	App D 4.5	NA, p. 27	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed (pg 27).
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	meeting minimum monitoring requirements.]				
35.	Pb collocation: for non-NCore sites	App A 3.4.4 and 3.4.5	NA, p. 27	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed (pg 27).
36.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA, p. 27	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed (pg 27).
37.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP	58.10 (b)(11)	NA, p. 27	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed (pg 27).
38.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	NA, p. 27	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed (pg 27).
39.	Sampling schedule for Pb	58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c)	NA, p. 27	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed (pg 27).
40.	Frequency of flow rate verification for Pb monitors audit	App A 3.4.1 and 3.4.2	NA, p. 27	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed (pg 27).
41.	Dates of two semi-annual flow rate audits conducted in CY2018 for Pb monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App A 3.4.3	NA, p. 27	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed (pg 27).

GENERAL GASEOUS MONITORING REQUIREMENTS

42.	Frequency of one-point QC check (gaseous)	App. A 3.1.1	Y, App A	Y	
43.	Date of Annual Performance Evaluation (gaseous) conducted in CY2018	App. A 3.1.2	Y, App A	Insufficient to judge	The Echo Summit O ₃ monitor was “not audited in 2017”, but the site table doesn’t include any audits in 2018. The Trona SO ₂ and O ₃ monitors were audited on 10/25/2017. Potential typo – should be 10/25/2018?

O₃ –SPECIFIC MONITORING REQUIREMENTS

44.	Minimum # of monitoring sites for O ₃ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are	App D 4.1(a) and Table D-2	Y, p. 18-20	Y	
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	eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]				
45.	Identification of maximum concentration O ₃ site(s)	App D 4.1 (b)	Y, p 19-20	Y	
46.	Sampling season for O ₃ (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4); App D 4.1(i)	Y, p. 21, App A, App B	Y	Please note that an updated waiver request, including 2019 data, will be required for future ozone season waiver approvals after March 31, 2020.
47.	A plan for making Photochemical Assessment Monitoring Stations (PAMS) measurements, if applicable. The plan shall provide for the required PAMS measurements to begin by June 1, 2019.	58.10 (a)(10)	Y, p. 39-40	Y	The plan states that "Ventura County APCD will work with CARB and U.S. EPA Region 9 to develop an EMP which, currently, is due by August 2020." As stated in 40 CFR part 58, Appendix D, paragraph 5(h) and outlined in the 12/13/2018 EMP Guidance Document, for States with moderate and above O ₃ non-attainment areas under the 1997 or 2008 NAAQS and States in the Ozone Transport Region, the EMPs were due October 1, 2019.

NO₂ –SPECIFIC MONITORING REQUIREMENTS

48.	Minimum monitoring requirements for area-wide NO ₂ monitor in location of expected highest NO ₂ concentrations representing neighborhood or larger scale (operation required by 1/1/13)	App D 4.3.3	NA, p. 22	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed.
49.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO ₂ (operation required by January 1, 2013)	App D 4.3.4	NA, p. 24	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed.
50.	Identification of required NO ₂ monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	NA, p. 22-24	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed.

NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS

In CBSAs ≥ 2.5 million, the following near-roadway minimum monitoring requirements apply:

51.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	NA, p. 22-23	NA	None required for the districts/areas covered in detail by the CARB ANP.
52.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	NA, p. 25	NA	None required for the districts/areas covered in detail by the CARB ANP.
53.	One PM _{2.5} monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	NA, p. 32	NA	None required for the districts/areas covered in detail by the CARB ANP.

In CBSAs ≥ 1 million and AADT $\geq 250K$, the following near-roadway minimum monitoring requirements apply:

54.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	NA, p. 22-23	NA	None required for the districts/areas covered in detail by the CARB ANP.
55.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	NA, p. 25	NA	None required for the districts/areas covered in detail by the CARB ANP.
56.	One PM _{2.5} monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	NA, p. 32	NA	None required for the districts/areas covered in detail by the CARB ANP.

In CBSAs ≥ 1 million and ≤ 2.5 million AND AADT $< 250K$, the following near-roadway minimum monitoring requirements apply:

57.	One NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3)	NA, p. 22-23	NA	None required for the districts/areas covered in detail by the CARB ANP.
58.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	NA, p. 25	NA	None required for the districts/areas covered in detail by the CARB ANP.
59.	One PM _{2.5} monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	NA, p. 32	NA	None required for the districts/areas covered in detail by the CARB ANP.

SO₂ –SPECIFIC MONITORING REQUIREMENTS

60.	Minimum monitoring requirements for SO ₂ based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	NA, p. 26	NA	None required for the districts/areas covered in detail by the CARB ANP. General requirements discussed.
61.	Monitors used to meet Data Requirements Rule (operational no later than January 1, 2017.)	51.1203(c)	NA, p. 26	NA	None required for the districts/areas covered in detail by the CARB ANP. General

					requirements discussed.
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NCORE –SPECIFIC MONITORING REQUIREMENTS

62.	NCore site and all required parameters operational: year-round O ₃ , SO ₂ , CO, NO _y , NO, PM _{2.5} mass, PM _{2.5} continuous, PM _{2.5} speciation, PM _{10-2.5} mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity. NO _y waiver, if applicable.	App. D 3(b)	NA, p 39	NA	None required for the districts/areas covered in detail by the CARB ANP.
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SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)

63.	AQS site identification number for each site	58.10 (b)(1)	Y, App A	Y	
64.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Y, App A	Y	
65.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Y, App A	Y	
66.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, App A	Y	
67.	Basic monitoring objective for each monitor	App D 1.1; 58.10 (b)(6)	Y, App A	Y	
68.	Site type for each monitor	App D 1.1.1	Y, App A	Y	
69.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, App A		
70.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Y, App A	Y	
71.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and	Y, App A	Y	

		collocation) are met			
72.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Y, App A	Y	
73.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, App A	Y	
74.	Distance of monitor from nearest road	App E 6	Y, App A	Y	
75.	Traffic count of nearest road	App E	Y, App A	Y	
76.	Groundcover	App E 3(a)	Y, App A	Y	
77.	Probe height	App E 2	Y, App A	Y	
78.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App E 2	Y, App A	Y	
79.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Y, App A	Y	
80.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Y, App A	Y	
81.	Distance from the drip line of closest tree(s)	App E 5	Y, App A	N, in one instance	40 CFR 58 Appendix E states that the probe, inlet, or at least 90 percent of the monitoring path must be at least 10 meters or further from the drip line of trees. The Calexico-Ethel Street monitors do not meet this requirement.
82.	Distance to furnace or incinerator flue	App E 3(b)	Y, App A	Y	
83.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Y, App A	Y	
84.	Probe material (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Y, App A	Y	
85.	Residence time (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Y, App A	Y	

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?	No, Appendix E
Were comments included in ANP submittal?	NA
Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale.	NA
Were S/L/T responses to substantive comments included in ANP submittal?	NA
Were the S/L/T responses to substantive comments adequate?	NA
Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?	NA
Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale	NA

B. Elements Related to CARB Sites in Local Agency Plans where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- EPA identified items in the following annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Distance of monitor from nearest road	Santa Barbara, 74	Not meeting requirement in one instance
Minimum # of monitoring sites for PM ₁₀	SJV, 29	Not meeting requirement in some instances
Date of Annual Performance Evaluation (gaseous) conducted in CY2018	SJV, 43	Not meeting requirement in one instance
Distance from trees	SJV, 81	Not meeting requirement

In addition, the following comments were made in EPA's annual network plan approval letters for the following agencies:

San Joaquin Valley Air Pollution Control District:

- [Item 7] EPA Region 9 is not taking action on the Type 3 PAMS site requirement for the Bakersfield MSA. Upon resolution of issues noted on p. 12-13 of the plan, EPA Region 9 will work with SJVAPCD on this proposed modification to the PAMS network.

The Stockton-Hazelton site is slated to be closed by mid-summer 2020. The new site is yet to be determined. Please work with EPA on this upcoming system modification.

- [Item 17] Based on 2018 census population estimates, the Fresno MSA is required to have three SLAMs monitors. Please update Table 17 in next year's plan to reflect this information. SJVAPCD continues to meet this requirement.
- [Item 21] Table 20 is missing information on NAAQS comparability for the Visalia-Church St and Bakersfield-California PM_{2.5} FRM monitors. Please update in next year's plan.
- [Item 31] Based on Stockton-Hazelton's design concentration of 187 µg/m³ for 2018, sampling frequency for PM₁₀ monitoring should shift from a 1:6 to a 1:3 operating schedule starting January 1, 2020.

Based on Bakersfield-California's design concentration of $136 \mu\text{g}/\text{m}^3$ for 2018, sampling frequency for PM_{10} monitoring should shift from a 1:6 to a 1:1 operating schedule starting January 1, 2020.

The plan also notes that certain sites were impacted by wildfire smoke in 2018 that may affect sampling frequency requirements in these MSAs. Please work with EPA to ensure that sampling frequency requirements continue to be met in the future.

- [Item 47] The Fresno MSA 2018 population is currently above 1,000,000, therefore PAMS monitoring at the Fresno-Garland NCore site, if still applicable based on the next network assessment, is required 2 years after the next assessment is due.
- [Item 49] The Parlier site is operational and meeting this requirement. The replacement Arvin monitor is yet to be operational. Since the PAMS replacement site in Arvin is yet to be approved and operational (Item 7), the Bakersfield-Muni site temporarily serves as one of the two RA40 sites until the Arvin NO_2 monitor is reestablished.
- [Items 57, 58, and 59] Fresno CBSA 2018 estimated population is above 1 million, so near-road NO_2 , $\text{PM}_{2.5}$, and CO monitoring is required at this site in 2019.

Fresno-Foundry near-road NO_2 monitoring is operational, and Bakersfield-Westwind near-road NO_2 monitoring is established but currently not operational due to security reasons. SJV plans to begin monitoring CO and $\text{PM}_{2.5}$ at the Fresno-Foundry near-road site by the end of 2019.

C. EPA Approval of the Discontinuation of the Lincoln-1st Street Site and the Establishment of the New Lincoln-Moore Road SLAMS Site

This enclosure provides the EPA's review and approval for the Placer County Air Pollution Control District (PCAPCD)'s discontinuation of the O₃ State and Local Air Monitoring Station (SLAMS) monitor at the Lincoln-1st Street site (AQS ID: 06-061-2002) as well as the approval of the new O₃ SLAMS monitor at the replacement Lincoln-Moore site (AQS ID: 06-061-2003). Both requests were submitted within California Air Resource Board's 2019 Annual Network Plan (ANP).

Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the discontinuation of SLAMS monitors. 40 CFR 58.14(c) states that closures may be approved on a case-by-case basis as long as the discontinuance does not compromise data collection for implementation of the NAAQS and the requirements of 40 CFR 58 Appendix D continue to be met. Discontinuation of O₃ monitoring at the Lincoln-1st Street site was reviewed according to these provisions, based on certified data submitted to AQS.

Over the five-year period from 2013-2017 design values at the Lincoln-1st Street site were consistently lower than the highest concentration monitoring sites within the Sacramento Federal Ozone Nonattainment Area. Neither site was operational in 2018. Preliminary data currently available for a portion of 2019 at the Lincoln-Moore Street site are also consistent with these longer-term trends. Although Lincoln-1st Street has a 2017 design value of 0.075 ppm which violates the 2015 8-hour O₃ NAAQS, as noted in PCAPCD's request letter and supporting documentation, it is not and would be unlikely to become the maximum O₃ concentration site for the Sacramento Federal Ozone Nonattainment Area. Furthermore, discontinuance of this monitor does not compromise data collection needed for implementation of the O₃ NAAQS and will not prevent PCAPCD from meeting 40 CER 58 Appendix D requirements.

Accordingly, PCAPCD provided adequate supporting documentation and data analyses justifying the discontinuation of the Lincoln-1st Street site and the selection of the replacement Lincoln-Moore Street site. PCACPD noted that the reason for this system modification was that logistical problems beyond PCAPCD's control made it impossible to continue operation at the old site. PCAPCD worked with the City of Lincoln to find a new location that meets requirements described in 40 CFR 58 and its associated appendices for O₃ monitoring at the site. The new Lincoln-Moore Street site is 2.3 miles southwest of the old Lincoln-1st Street site and is expected to be at a similar scale of representation and free from trees and other obstructions in all directions. In addition to the new site's close proximity to the previous site, PCAPCD produced a wind pattern analysis to demonstrate that the predominant wind pattern and direction will be similar to the current site.

This approval assumes that the new site will meet all 40 CFR 58 requirements, including the siting requirements specified in Appendix E, as described in the site table for the new site in CARB's 2019 ANP. Please work with EPA to ensure that the new site meets all relevant requirements. Based on the information discussed above, including the similar scale of

representation, close proximity, and similar wind patterns, the data from the old and new sites will be combined to form one continuous data record for design value calculations. Please note this in the AQS comment field for both the old and the new AQS sites. Also, please include this network modification and EPA's approval in your next ANP.